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August 16, 2019

Via ECF

Honorable Carol B. Amon United States District Judge United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11210

Re: Schonberg, et al. v. Strulovitch, et al., Case No. 17 Civ. 2161 (CBA) (RML)

Dear Judge Amon:

This firm represents most of the plaintiffs in the above-referenced action. We write to inform the Court that several of the defendants in this action have filed bankruptcy petitions in the Bankruptcy Court for the Southern District of New York.

Defendant 73 Empire Development LLC filed for bankruptcy on February 21, 2019 (Case No. 19-2228). 73 Empire Development LLC did not inform plaintiffs in this action of the bankruptcy; we independently became aware of it.

More recently, the following defendants have separately filed for bankruptcy and all of their bankruptcy proceedings are being jointly administered:

- 53 Stanhope LLC (Case No. 19-23013);
- 55 Stanhope LLC (Case No. 19-23014);
- 325 Franklin LLC (Case No. 19-23017);
- 618 Lafayette LLC (Case No. 19-23018);
- 92 South 4th St LLC (Case No. 19-23023);
- 834 Metropolitan Avenue LLC (Case No. 19-23024);
- 1125-1133 Greene Ave LLC (Case No. 19-23025);
- APC Holding 1 LLC (Case No. 19-23026);
- 106 Kingston LLC (Case No. 19-23029);
- 1213 Jefferson LLC (Case No. 19-23031); and
- 167 Hart LLC (Case No. 19-23041).

We are analyzing the effect of these bankruptcy proceedings upon this action and how best to proceed.

Respectfully yours, /s Yitzchak Eliezer Soloveichik Cc: All parties (via ECF)